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**MEMO ENDORSED**

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By ECF

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 443  
New York, New York 10007

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Re: *Conte, et al. v. Metropolitan Transportation Authority and Triborough Bridge and Tunnel Authority* - Case No. 1:21-cv-02516

Dear Judge Caproni:

We represent Defendants Metropolitan Transportation Authority (“MTA”) and Triborough Bridge and Tunnel Authority (“TBTA”) (collectively, “Defendants”) in the above-referenced matter. We write jointly with Counsel for Plaintiffs in response to Your Honor’s email, dated today, concerning the Parties’ pre-conference submissions for next week’s Pre-Trial Conference, which were due yesterday, June 30, 2022. In light of the Court’s extension of the fact discovery deadline to October 3, 2022 (Dkt. 78), the Parties hereby request an adjournment of the Pre-Trial conference to a date at the Court’s convenience in September 2022. The Parties apologize for their misunderstanding as to the scheduling of the Pre-Trial Conference in light of the changes to the discovery deadlines.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Steven D. Hurd

Steven D. Hurd

cc: All counsel of record (via ECF)

Application GRANTED. The Pre-Trial Conference currently scheduled for July 8, 2022, at 10:00 a.m. is hereby ADJOURNED until **Friday, September 30, 2022, at 10:00 a.m.** Pre-conference submissions are due not later than **Thursday, September 22, 2022.** SO ORDERED.

  
7/1/22

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE